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Attorneys for Defendants/ Cross-Claimants/
Counterclaimants/ Third-Party Plaintiffs
John Jhang and Eui Ja Jhang

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

----- X
UNITED STATES OF AMERICA,

Plaintiff,

vs.

ARTHUR RICHARD HARTMAN, JR.,
Individually and as Executor of the Estate of Mario
Schettino, JOSEPH SCHETTINO, LILLIAN
SCHETTINO, JOHN JHANG, EUI JA JHANG and:
EMIGRANT FUNDING CORPORATION,

Defendants.

----- X
JOHN JHANG and EUI JA JHANG,

Third-Party Plaintiffs,

vs.

ALBERT H. BIRCHWALE, ESQ., BASILE,
BIRCHWALE & PELLINO, LLP, DANTON
PROPERTIES, L.L.C., JOHN DOES 1 THROUGH
5 (fictitious names) and ABC CORPORATIONS 1
THROUGH 5 (fictitious names),

Third-Party Defendants.

Civil Action No. 07-CV-3843 (FSH)(PS)

**NOTICE OF MOTION FOR ENTRY
OF DEFAULT JUDGMENT AGAINST
THIRD-PARTY DEFENDANT
DANTON PROPERTIES, L.L.C.
PURSUANT TO FRCP 55(b)**

TO:

Robert A. Berns, Esq.
John P. O'Toole, Esq.
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Thomas F. DiLullo, PC
123 Clarendon Place
Hackensack, NJ 07601

PLEASE TAKE NOTICE THAT, defendants/ cross-claimants/ counterclaimants/ third-party plaintiffs John Jhang and Eui Ja Jhang (the "Jhangs"), by their counsel, Herrick, Feinstein LLP, shall move before the Honorable Patty Shwartz, U.S.M.J., at the United States Courthouse in the U.S.P.O. & Courthouse Building, Room #369, Newark, New Jersey 07101, on March 9, 2009, at 9:30 a.m., or as soon thereafter as it may be heard, for an order entering default judgment against third-party defendant Danton Properties, LLC ("Danton") in this action, pursuant to Fed. R. Civ. P. 55(b)(2).

PLEASE TAKE FURTHER NOTICE that the Jhangs shall rely upon the Declaration of Jaimee Katz Sussner, Esq., dated February 12, 2009, and the exhibits annexed thereto.

A proposed Final Judgment by Default against Danton is submitted herewith.

HERRICK, FEINSTEIN LLP
Attorneys for Defendants/
Counterclaimants/ Cross-Claimants/
Third-Party Plaintiffs
John Jhang and Eui Ja Jhang

By /s/ Jaimee Katz Sussner
Jaimee Katz Sussner
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One Gateway Center, 22nd Floor
Newark, New Jersey 07102
Phone: 973.274.2000

Dated: February 12, 2008

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the Notice of Motion, the Declaration of Jaimee Katz Sussner, Esq., and the proposed Final Judgment by Default were filed electronically with the United States District Court for the District of New Jersey on this 12th day of February, 2009, with notice of case activity generated and sent electronically and via regular mail to:

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Attorneys for Defendant/ Cross-Claim Defendant Arthur Richard Hartman, Jr., Individually and in his capacity as the Executor of the Estate of Mario Schettino

The undersigned also certifies that a copy of the Notice of Motion, the Declaration of Jaimee Katz Sussner, Esq., and the proposed Final Judgment by Default were served on this 12th day of February, 2009 via regular mail to:

Danton Properties, LLC
5809 Madison Street
West New York, NJ 07093

Dated: February 12, 2009

/s/ Jaimee Katz Sussner
Jaimee Katz Sussner